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District of Nevada  
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Atorneys for Defendant

UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for Defendant to file her response to Plaintiff's Motion for Reversal/Remand be extended from May 9, 2019 to May 15, 2019. This is Defendant's fourth request for extension. Good cause exists to grant Defendant's request for extension. Since the time of the last extension, Counsel has been taking care of her elderly mother following the death of Counsel's uncle and two cousins. Counsel's mother is scheduled for surgery and was out of the office on the date of the current filing deadline to take her mother to the hospital. Due to unexpected leave, Counsel respectfully requests additional time to adequately review the transcript and respond to the issues raised in Plaintiff's

1 Motion. Defendant makes this request in good faith with no intention to unduly delay the proceedings.  
2 Defendant apologizes for the belated request for extension, but filed an extension of time as soon as  
3 reasonably practicable. The parties further stipulate that the Court's Scheduling Order shall be  
4 modified accordingly.

5  
6 Respectfully submitted,

7 Dated: May 9, 2019

8 /s/ Joshua Harris  
9 (\*as authorized by email on May 9, 2019)  
10 JOSHUA HARRIS  
11 Attorney for Plaintiff

12 Dated: May 9, 2019

13 NICHOLAS A. TRUTANICH  
14 United States Attorney  
15 DEBORAH LEE STACHEL  
16 Regional Chief Counsel, Region IX  
17 Social Security Administration

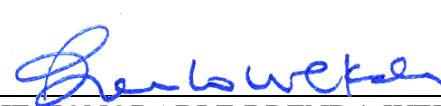
18 By

19 /s/ Tina L. Naicker  
20 TINA L. NAICKER  
21 Special Assistant U.S. Attorney  
22 Attorneys for Defendant

23 **ORDER**

24 APPROVED AND SO ORDERED:

25 DATED: May 14, 2019

26   
THE HONORABLE BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE

## **CERTIFICATE OF SERVICE**

I, TINA L. NAICKER, certify that the following individual was served with a copy of the  
**JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO**  
**RESPOND TO PLAINTIFF'S MOTION FOR REMAND** on the date and via the method of  
service identified below:

## CM/ECF:

**Joshua R Harris**  
Richard Harris Law Firm  
801 South Fourth Street  
Las Vegas, NV 89101  
702-444-4444  
Fax: 702-444-4455  
Email: [josh@richardharrislaw.com](mailto:josh@richardharrislaw.com)

Attorneys for Plaintiff

Respectfully submitted this 9th day of May 2019,

/s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant United States Attorney